

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In Re: LEWIS E. WILKERSON, JR.

Case No.: 20-34576-KLP
Chapter 11

Debtor.

OBJECTION TO PROOF OF CLAIM
NUMBER 33 FILED BY ROBERT DIXON

COMES NOW the Debtor, Lewis E. Wilkerson, Jr., by counsel, and objects, for the following reasons, to the proof of claim in the amount of \$383500.00 that was filed in his bankruptcy case, by Robert Dixon, on or about March 17, 2021:

1. Robert Dixon has filed in the above Debtor case, a proof of claim for a debt in the amount of \$383500.00, and that claim has been designated as Claim No. 33.

2. The Debtor objects to Claim No. 33 filed by Robert Dixon, as the Debtor is not indebted to Robert Dixon in any amount. An adversary proceeding with the case number 21-03008 is set for trial in the United States Bankruptcy Court on September 15, 2021.

WHEREFORE, the Debtor asks that the Court disallow the proof of claim that was filed on or about March 17, 2021, by Robert Dixon for a debt in the amount of \$383500.00, and Order that the claim be disallowed.

NOTICE: is hereby given to the above-named creditor, pursuant to Local Bankruptcy Rule 3007-1, that unless a written response and a request for a hearing on this objection are filed with the Clerk of the Court and served on the objecting party and the Chapter 11 Trustee, within 30 days of the service of this objection, the Court may

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Counsel for Debtor

deem any opposition waived, treat the objection as conceded, and enter an order granting the requested relief without a hearing.

LEWIS E. WILKERSON, JR.

By: /s/ Robert A. Canfield
Counsel

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NOTICE OF OBJECTION

Lewis E. Wilkerson, Jr., the Debtor herein, has filed an Objection to the Proof of Claim No. 33 that was filed in his Chapter 11 bankruptcy case by Robert Dixon.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief requested in the Debtor Objection to Proof of Claim Number 33, or if you want the Court to consider your views on the objection, then **on or before August 21, 2021**, you or your attorney must:

- File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

- You must also mail a copy to:

Robert A. Canfield, Esquire
Canfield Wells, LLP
4124 E. Parham Road
Richmond, VA 23228

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

LEWIS E. WILKERSON, JR.

By: /s/ Robert A. Canfield
Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of July, 2021, a copy of the foregoing Objection and Notice of Objection were either electronically transmitted and/or mailed by regular mail, postage prepaid to the following:

Robert Dixon
c/o W. R. Baldwin, III, Esq.
5600 Grove Ave
Richmond, VA 23226
Counsel for Creditor
Served by Regular Mail

Robert Dixon
c/o William F. Seymour, IV, Esq.
FloranceGordonBrown, P.C.
1900 One James Street
901 East Cary Street
Richmond, VA 23219
Counsel for Creditor
Served by Regular Mail

Jason B. Shorter, Trial Attorney
Shannon F. Pecoraro, Trial Attorney
Kathryn R. Montgomery, Assistant United States Trustee
Office of the US Trustee
701 E. Broad Street, Ste. 4304
Richmond, VA 23219
Chapter 11 Trustee
Served Electronically

/s/ Robert A. Canfield
Robert A. Canfield

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